

UNITED STATES DISTRICT COURT  
for the  
District of Massachusetts

United States of America )  
v. )  
Brian Andrew Bushell ) Case No. 22-MJ-4506-DHH  
Tracey M.A. Stockton )  
)  
)  
)  
)  
\_\_\_\_\_  
Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2020 to August 2022 in the county of Essex in the  
District of Massachusetts, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1349	Conspiracy to commit wire fraud and conspiracy to commit unlawful monetary
18 U.S.C. 1956(h)	transactions

This criminal complaint is based on these facts:

See attached Affidavit of FBI Special Agent Chad Oakes

Continued on the attached sheet.

*Chad Oakes/2022*  
Complainant's signature

Special Agent Chad Oakes, FBI

Printed name and title

By telephone in accordance with Fed. R. Crim. P. 4.1.  
Sworn to before me ~~and signed in my presence~~.

Date: Oct 11, 2022

City and state: Worcester, Massachusetts

*David H. Hennessy*  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
Hon. David H. Hennessy, U.S. Magistrate Judge  
Printed name and title